

Exhibit No. KGS-18
Docket UE-15____
Witness: Kurt G. Strunk

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFIC POWER & LIGHT
COMPANY,

Petition For a Rate Increase Based on a Modified
Commission Basis Report, Two-Year Rate Plan,
and Decoupling Mechanism.

Docket UE-15____

PACIFIC POWER & LIGHT COMPANY

EXHIBIT OF KURT G. STRUNK

Summary of Adjustment Mechanisms for Proxy Group Utilities

November 2015

Pacific Power & Light Company
Use of Adjustment Clauses by Proxy Group Companies
As Extracted from Regulatory Research Associates Special Report
"Adjustment Clauses: A State-by-State Overview"
Published on October 2, 2015

Ultimate Parent Ticker	State	Company	Type Service	Type of Adjustment Clause										
				Electric Fuel/ Gas Commodity/		Conserv. Program		Decoupling		Renewable Expense	Environmenta Compliance	New Capital		RTO-Transmission Expense
				Purch. Power	Gas	Expense	Program	Full	Partial			Capacity	Generic	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
D	Texas	CenterPoint Energy Houston Electric	Elec.	--	✓	--	--	--	--	--	--	✓	✓	✓
	Texas	CenterPoint Energy Resources	Gas	--	--	--	--	--	--	--	--	✓	--	--
	Virginia	Virginia Electric & Power	Elec.	✓	✓	--	--	✓	✓	--	--	--	--	--
DTE	Ohio	East Ohio Gas	Gas	--	--	--	--	--	--	--	--	✓	--	✓
	West Virginia	Hope Gas	Gas	✓	--	--	--	--	--	--	--	--	--	✓
	Michigan	DTE Electric	Elec.	✓	✓	--	--	✓	✓	--	--	✓	✓	--
ED	Michigan	DTE Gas	Gas	✓	✓	--	✓	--	--	--	--	✓	--	--
	New Jersey	Rockland Electric	Elec.	--	✓	--	--	✓	✓	--	--	--	--	✓
	New York	Consolidated Edison of New York	Elec.	--	✓	✓	--	✓	✓	--	--	--	--	--
EDE	New York	Consolidated Edison of New York	Gas	✓	--	✓	--	--	--	--	--	--	--	--
	New York	Orange & Rockland Utilities	Elec.	--	--	✓	--	✓	✓	--	--	--	--	--
	New York	Orange & Rockland Utilities	Gas	✓	--	✓	--	--	--	--	--	--	--	--
EE	Kansas	Empire District Electric	Elec.	✓	✓	--	--	--	✓	✓	--	--	--	✓
	Missouri	Empire District Electric	Elec.	✓	--	--	--	--	✓	✓	--	--	--	✓
	Missouri	Empire District Gas	Gas	✓	--	--	--	--	--	--	--	--	--	✓
EIX	New Mexico	El Paso Electric	Elec.	✓	✓	--	--	--	--	--	--	✓	✓	✓
	Texas	El Paso Electric	Elec.	✓	✓	--	--	--	--	--	--	✓	✓	✓
ES	California	Southern California Edison	Elec.	✓	--	✓	--	--	--	--	--	--	--	--
	Connecticut	Connecticut Lt. & Pwr.	Elec.	--	✓	✓	--	--	--	--	--	--	✓	--
	Connecticut	Yankee Gas Service	Gas	✓	✓	--	--	--	--	--	--	✓	--	--
EE	Massachusetts	NSTAR Electric	Elec.	--	✓	--	--	--	--	--	--	--	✓	✓
	Massachusetts	NSTAR Gas	Gas	✓	✓	--	--	--	✓	--	--	--	--	✓
	Massachusetts	Western Mass. Electric	Elec.	--	✓	✓	--	--	✓	✓	✓	--	✓	✓
EE	New	Public Service Co. of New	Elec.	✓	--	--	--	--	--	--	--	✓	✓	✓

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Use of Adjustment Clauses by Proxy Group Companies
As Extracted from Regulatory Research Associates Special Report
"Adjustment Clauses: A State-by-State Overview"
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Ultimate Parent Ticker (1)	State (2)	Company (3)	Type Service (4)	Type of Adjustment Clause														
				Electric Fuel/ Gas Commodity/ (5)		Conserv. Program Expense (6)		Decoupling Full Partial (8)		Renewable Expense (9)		Environmenta Compliance (10)		New Capital (11)		RTO-Transmission Expense (13)		Other (14)
				Purch. Power (5)	Program Expense (6)	Full (7)	Partial (8)	Renewable Expense (9)	Environmenta Compliance (10)	Capacity (11)	Generic (12)	Transmission Expense (13)						
XEL	Colorado	Public Service Co. of Colorado	Elec.	✓	✓	--	--	✓	--	--	--	--	✓	--	✓			
	Colorado	Public Service Co. of Colorado	Gas	✓	✓	✓	✓	--	--	--	--	--	✓	--	--			
	Minnesota	Northern States Power-Minnesota	Elec.	✓	✓	--	--	✓	✓	✓	✓	--	--	✓	--			
	Minnesota	Northern States Power-Minnesota	Gas	✓	✓	--	--	--	--	--	--	--	✓	--	--			
	New Mexico	Southwestern Public Service	Elec.	✓	✓	--	--	✓	✓	✓	✓	--	--	--	✓			
	North Dakota	Northern States Power-Minnesota	Elec.	✓	--	--	--	✓	✓	✓	✓	--	--	--	✓			
	North Dakota	Northern States Power-Minnesota	Gas	✓	--	--	--	--	--	--	--	--	✓	--	--			
	South Dakota	Northern States Power-Minnesota	Elec.	✓	✓	--	✓	--	--	✓	✓	--	✓	--	✓			
	Texas	Southwestern Public Service	Elec.	✓	✓	--	--	--	--	--	--	--	✓	--	✓			
	Wisconsin	Northern States Power-Wisconsin	Elec.	✓	--	--	--	--	--	--	--	--	--	--	✓			
	Wisconsin	Northern States Power-Wisconsin	Gas	✓	--	--	--	--	--	--	--	--	--	--	✓			

Notes:
Data are from SNL Financial Regulatory Research Associates Topical Special Report, "Adjustment Clauses: A State-by-State Overview," October 2, 2015.